

James B. Wright Senior Attorney

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June 29, 2000

Mr. K. David Waddell, Executive Secretary Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505

> RE: Docket No. 00-00544, Generic Docket to establish UNE prices for line sharing per FCC 99-355, and riser cable and terminating wire as ordered in TRA docket 98-00123.

Dear Mr. Waddell:

In accordance with the Tennessee Regulatory Authority ruling in the May 9, 2000 Directors' Conference and the subsequent Reminder Notice of Filing Schedule dated June 26, 2000, enclosed please find an original and thirteen copies of United Telephone-Southeast, Inc.'s Petition to Intervene in the above mentioned docket, together with a check for the twenty five dollar filing fee. Also enclosed is UTSE's line sharing cost studies. United considers the cost information to be proprietary and requests that it be handled as such.

Consistent with the FCC line sharing order, UTSE utilized the TELRIC methodology to calculate the line share costs. Of the five types of direct costs identified by the FCC, UTSE has not incorporated costs for two of them- the local loop and the splitter. This policy is explained more fully in the attached studies.

Finally, UTSE has not developed permanent costs for riser cable or terminating wire portions of the local loop. UTSE has not received any CLEC requests for these loop sub-elements. Furthermore, costs for both riser cable and terminating wire are highly variable in terms of provisioning. Due to the non-standard nature of these loop sub-elements, the rates and costs would be more appropriately addressed on an ICB basis.

Sincerely,

Enclosures

James B. Wrig Propoeleury

cc: Dennis Wagner Laura Sykora Kaye Odum Steve Parrott

## BEFORE THE TENNESSEE REGULATORY AUTHORITY

## NASHVILLE, TENNESSEE

IN RE:

Generic Docket to establish UNE prices for lines sharing per FCC 99-355 and riser cable and terminating wire as ordered in TRA Docket 98-00123

Docket No.00-00544

## PETITION OF UNITED TELEPHONE-SOUTHEAST, INC. FOR LEAVE TO INTERVENE

United Telephone-Southeast, Inc. ("United") pursuant to T.C.A. § 4-5-310 and T.C.A. § 65-2-107, petitions the Authority for leave to intervene in the above-captioned proceeding, and in support thereof states as follows:

- 1. United is a Virginia Corporation authorized to conduct business in the state of Tennessee as an incumbent local exchange company, furnishes local exchange telephone service and other telecommunications services in the state of Tennessee and is subject to the jurisdiction of the Authority.
- 2. This Petition is filed more than seven (7) days before any scheduled hearing in this matter.
- 3. United respectfully requests that it be granted leave to intervene and participate as a party in the above-captioned proceeding in that as an incumbent local exchange company, the decisions regarding prices for line sharing which are the subject of this proceeding may directly affect United's legal rights, duties, privileges, immunities or other legal interests.

4. The interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention.

## WHEREFORE, United prays:

- 1. That it be permitted to intervene in this proceeding and participate as a party.
- 2. That it have such other and further relief to which it may be entitled.

Respectfully submitted,

UNITED TELEPHONE-SOUTHEAST, INC.

James B. Wright

Senior Attorney

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